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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

MANDY RICE, D.O.,  
PLAINTIFF,

vs. No. 4:19-CV-3166-SEP

ST. LOUIS UNIVERSITY,  
CATHERINE M. WITTGEN, M.D.,  
CARL A. FREEMAN, M.D., and  
MICHAEL WILLIAMS, M.D.,  
DEFENDANTS.

DEPOSITION OF MANDY RICE, D.O.  
VOLUME V

TAKEN ON BEHALF OF DEFENDANT

JUNE 22, 2020

TINA M. STUMPF, RPR, CSR  
MISSOURI CCR # 623

1           A       It's pretty specific that I called him in  
2       a lawsuit for harassing me and retaliating against  
3       me. And so --

4           Q       So you believe it's the lawsuit that  
5       caused him to be upset and not want to participate  
6       in that surgery with you?

7           A       One plus one equals two.

8           Q       Okay. Um, let's take a look, if you  
9       would, at paragraph J.

10                  And by the way, by the time of that  
11       incident that we looked at in I, you'd already been  
12       told, um, you'd already been notified that you were  
13       being non-renewed, correct?

14           A       Yes. I was told --

15           Q       Okay.

16           A       -- I was fired on the 4th, I believe.

17           Q       You were told you were non-renewed and you  
18       were offered a six-month contract, correct?

19           A       That's firing. We've discussed that  
20       before.

21                  MR. BOHM: Mandy, keep your voice up,  
22       please.

23           A       That's firing. We've discussed that  
24       before.

25           Q       Paragraph 3J. You essentially assert that

1 the decision to transfer you to another service  
2 while Dr. Montenegro was covering acute care in May  
3 of 2018 was retaliatory, correct?

4 A Yes.

5 Q And why do you believe that's the case?

6 A I mean it's very obvious she doesn't want  
7 to work with me. There is no other reason to remove  
8 a chief off of their service for one week while one  
9 person's there and then move them back again.

10 Q Anything else that leads you to believe  
11 that it was retaliatory?

12 A The fact that she didn't want to work with  
13 me.

14 Q In retaliation for what?

15 A For standing up for myself, and for  
16 complaining against the harassment, and bullying,  
17 and discrimination that I underwent.

18 Q And do you have any evidence that that's  
19 the reason?

20 A Logic.

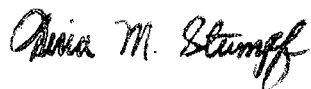
21 Q And, um, did you suffer any consequence as  
22 a result of being moved off of that, um, service?

23 A Uh, so that was future. That was going to  
24 happen.

25 Q Right.

CERTIFICATE OF REPORTER

I, Tina M. Stumpf, Certified Court Reporter and Registered Professional Reporter, Notary Public within and for the State of Missouri, do hereby certify that the witness whose testimony appears in the foregoing deposition was duly sworn by me; the testimony of said witness was taken by me to the best of my ability and thereafter reduced to typewriting under my direction; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this deposition was taken, and further that I am not a relative or employee of any attorney or counsel employed by the parties thereto, nor financially or otherwise interested in the outcome of the action.



Notary Public within and for  
the State of Missouri

My commission expires March 28, 2022.